Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
In re: Delete, Delete, Delete	)	GN Docket No.25-133
	)	
	)	DA-25-219

To: The Commission

Comments from Hewlett Packard Enterprise

Hewlett Packard Enterprise (HPE) is grateful and honored for the opportunity opened on commenting on the important Public Notice of Proposed changes & deletion of FCC rules.

HPE manufactures and sells unintentional/intentional radiator equipment that is subjected to the FCC Part 15 rules. For unintentional radiators, this requires the equipment to be compliant to either the FCC-limits, or alternatively, for the small frequency range of 30 MHz to 1000 MHz, limits contained in international standard-CISPR 22:1997 can be substituted. For both sets of emission limits, the C63.4 measurement method must be used. Outside of Canada, the C63.4 measurement method is not used nor recognized by other countries. The CISPR 22: 1997 has been superseded by international standard CISPR 32:2015, with a widely adopted scope and currently fully leveraged by many countries. After close consideration and review, HPE suggests the FCC adopt and allow the full use of international standard CISPR 32: 2015 and its associated CISPR 32:2015 amendments for both the emission limits and methods of measurement for products within the scope of CISPR 32. Using only the C63.4 test method and the limits contained in FCC rule 15.109, poses a barrier on competitive

marketing and multiple testing standards, thus having cost-benefits conflicts for manufacturers, laboratories and other associations. The FCC adoption and allowance of using CISPR 32:2015 will lift a burden on manufacturers, laboratories and other associations resulting in greater benefits, thrive of modernizing their equipment, developing infrastructure, and offering innovative and advanced capabilities. Products marketed only in the United States, could continue to comply with existing rules.

Additionally, after close consideration and review on the specifics of intentional radiators as described in *47 CFR part15 subpart-C*, HPE suggests the FCC(OET) to transition from certification authorization program (*47CFR part2 subpart J-2.907*) into only the SDoC authorization program (*47CFR part2 subpart J-2.906*). The current certification authorization program has a more rigorous process that requires application-forms to the FCC, testing by an accredited lab, obtaining an FCC ID and additional submittals. All the elements mentioned are able to be SDoC processed with collaboration with the manufacturer/supplier and accredited lab only. After the equipment has been tested and found compliant by an accredited lab, the manufacturer/supplier will declare (SDoC) the equipment has been found to be compliant with the relevant FCC rules. Not only is the SDoC program faster and costly convenient, the SDoC program additionally offers innovative and advanced capabilities for manufacturers to quickly compete with revolutionary solutions or technology beyond the confinement of FCC certification standards.

With reference and consideration from the previous paragraph comments, HPE additional suggests the removal or reduction in the list of items on the PAG-Pre-Approval Guidance list per FCC-KDB 388624. The removal or reduction will relieve unnecessary burdens of workloads on the FCC. The current FCC format is for the PAG reviews to be assessed through the TCB review and FCC review. The additional FCC review imposes an extra redundant review that might result in delays on the manufacturer/supplier production

deadline or creating other manufacturer/supplier constraints. The suggested reduction of the PAG items to soley have the TCB review will be considerably beneficial and will result in prompting manufacturers/suppliers to bring products to market efficiently & faster.

We thank the Commission for the opportunity to openly share HPE comments. HPE is looking forward to the Commissions output on the comments submitted regarding this proceeding with consideration to the concerns and suggestions mentioned.

Respectfully submitted,
Hewlett Packard Enterprise

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